



August 31, 2021

Granted.
So ordered: 8/31/2021

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, N.Y. 10007



J. PAUL OETKEN
United States District Judge

Re: United States v. Martin Concepcion, 19-Cr-883 (JPO)

Request for Adjournment of Motion Schedule

Dear Judge Oetken:

Mr. Commissiong and I represent Mr. Martin Concepcion as CJA Counsel in the above-referenced matter. We write with the consent of all defense counsel and the government to respectfully request an adjournment of the current motion schedule, which has a deadline of September 3, 2021 for defense motions. We are respectfully requesting an adjournment of that deadline of 30 days to October 4, 2021. The reason for our request is that co-counsel Mr. Commissiong has only been a part of this case since mid July and just last week received discovery from the government in this case, which totals over one (1) terabyte of material. We also understand that new defense counsel has recently been appointed for co-defendant Mr. Michael Valdez. The additional time will be necessary in order for all defense counsel to continue reviewing discovery in preparation for any motions. Neither the government nor other defense counsel have any objection to this request.

We thank the Court in advance for its consideration of our request.

Respectfully submitted,

s/ Judith Vargas & Karloff Commissiong
Judith Vargas / Karloff Commissiong
Attorneys for Mr. Martin Concepcion

cc: the Court and all parties (via ECF and email)